

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

No

4:14CR00159 JAR/TIA

in a matter within the jurisdiction of the United States Department of Housing and Urban Development, a department of the United States, did knowingly and willfully make and use and cause to be made and used a false document, knowing the same to contain a materially false, fictitious and fraudulent statement, in that, on an annual recertification for the federal housing choice voucher program, more commonly referred to as Section 8 housing benefits, which was administered by the Lincoln County Public Housing Agency, defendant did state and represent and cause to be stated and represented that his household was comprised of himself and three minor children, when in truth and in fact as defendant well knew, he lived alone as on September 7, 2010, Judge Thomas J. Frawley of the Circuit Court of Warren County, Missouri awarded his former spouse, S.L.G., sole legal custody of K.B.G., their eldest child, and ordered that the dissolution of

marriage decree entered on February 2, 2006 which awarded S.L.G. sole legal custody of their other two children, M.G. and J.G., remain in full force and effect.

In violation of Title 18, United States Code, Section 1001.

COUNT TWO

The Grand Jury further charges:

On or about June 11, 2012, in the Eastern District of Missouri, the defendant,

KEITH GENTRY,

in a matter within the jurisdiction of the Social Security Administration, an agency of the United States, did knowingly and willfully make and cause to be made a false, fictitious, and fraudulent statement and representation as to a material fact and did make and use and cause to be made and used a false document, knowing the same to contain a materially false, fictitious and fraudulent statement, in that, on the form entitled "Statement for Determining Continuing Eligibility for Supplemental Security Income," defendant did state and represent and cause to be stated and represented, that between June 1, 2010 and June 11, 2012, he had no income, when in truth and in fact, as defendant, then well knew, during that time period, defendant had income from a dog breeding business through which he earned more than \$300.00 for each dog sold and a worker's compensation settlement through which he netted more than \$44,000.00.

In violation of Title 18, United States Code, Section 1001.

COUNT THREE

The Grand Jury further charges:

On or about June 11, 2012, in the Eastern District of Missouri, the defendant,

KEITH GENTRY,

in a matter within the jurisdiction of the Social Security Administration, an agency of the United States, did knowingly and willfully make and cause to be made a false, fictitious, and fraudulent statement and representation as to a material fact and did make and use and cause to be made and used a false document, knowing the same to contain a materially false, fictitious and fraudulent statement, in that, on the form entitled "Statement for Determining Continuing Eligibility for Supplemental Security Income," defendant did state and represent and cause to be stated and represented, that he had two bank accounts containing a total of \$5.00, when in truth and in fact, as defendant, then well knew, during that time period, defendant concealed income his dog breeding business and a worker's compensation settlement by depositing and withdrawing funds from accounts he controlled, but which he opened in the names of: his brother and two of his minor children, M.G. and J.G..

In violation of Title 18, United States Code, Section 1001.

COUNT FOUR

The Grand Jury further charges:

On or about September 6, 2012, in the Eastern District of Missouri, the defendant,

KEITH GENTRY,

in a matter within the jurisdiction of the United States Department of Agriculture, a department of the United States, did knowingly and willfully make and cause to be made a false, fictitious, and fraudulent statement and representation as to a material fact and did make and use and cause to be made and used a false document, knowing the same to contain a materially false, fictitious and fraudulent statement, in that, on an Application for Food Stamp Benefits, administered by the Missouri Department of Social Services, defendant did state and represent and cause to be stated and represented, that his household was comprised of himself and two of his minor children, M.G. and J.G., when in truth and in fact, as defendant, then well knew, M.G. and J.G. did not live in his household pursuant to a dissolution of marriage order entered on February 2, 2006 and affirmed on September 7, 2010 through a custody order entered by Judge Thomas J. Frawley of the Circuit Court of Warren County, Missouri.

In violation of Title 18, United States Code, Section 1001.

COUNTS FIVE THROUGH SIX

On or about the dates listed below, within the Eastern District of Missouri,

KEITH GENTRY,

the defendant herein, did embezzle, steal, purloin, or knowingly convert to his use money of the United States or of any department or agency thereof, or any property made or being made under contract for the United States or any department or agency thereof, to wit: funds from federal departments and agencies in the following amounts:

<u>COUNT</u>	<u>DATE</u>	<u>AGENCY/DEPARTMENT</u>	<u>AMOUNT</u>
5	July 1, 2011	United States Department of Housing and Urban Development	\$666.00
6	July 1, 2013	Social Security Administration	\$710.00

All in violation of Title 18, United States Code, Sections 641 and 2.

A TRUE BILL.

FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

TRACY L. BERRY, 014753 TN
Assistant United States Attorney